

Appl. No. 10/786,004
Reply Dated March 20, 2008
Reply to Office action of December 27, 2007

REMARKS

This submission is in reply to the further office action dated December 27, 2007.

Claim Rejections – 35 USC 102

Claims 1-50 stand rejected in this application under 35 U.S.C. 102 as being anticipated by US Publication No. 20050044197 in the name of Ray Y. Lai (hereinafter "Lai"). Applicants respectfully traverse all rejections.

As the Examiner will appreciate, a single prior art reference anticipates a patent claim if it expressly or inherently describes each and every limitation set forth in the patent claim: Trintec Indus. Inc. v. Top-U.S.A. Corp., 63 USPQ2d 1597, 1599 (Fed. Cir. 2002).

To expedite prosecution and not for reasons pertaining to patentability, independent claims 1, 24 and 50 have been amended to describe features recited in claims 4, 5, 27 and 28 as filed, and as described at paragraphs [0008], [0057] and [0058] of the Applicants' description. Indices "a)", "b)" and "c)" have been deleted from the independent claims for clarity (e.g., in view of claims 18 and 42). No new matter has been added. Claims 4, 5, 27 and 28 are cancelled, without prejudice.

Independent claims 1, 24 and 50, as amended, require that the method be performed at a computing device remotely coupled to the mobile device. This feature is not disclosed in Lai. In contrast, Lai discloses that a "Service Requester" or consumer may access services from a variety of mobile devices (see e.g. Lai, [0412]) and accordingly, it will be understood that at least some of the steps, purported to be performed in Lai by the Examiner on pages 2-3 of the Office Action, are performed by the Service Requester at a mobile device, and

not at a computing device remotely coupled to the mobile device as recited in the Applicants' independent claims. Accordingly, the burden of proof that is required to reject claims 1, 24 and 50 as being anticipated by Lai has not been met.

Independent claims 1, 24 and 50, as amended, further requires that the act of creating at least one accelerator output file from said web service description comprises optimizing said web service description for said mobile device, wherein said at least one accelerator output file comprises an optimized web service description adapted for processing by said mobile device. These features are not disclosed in Lai. Lai appears to disclose the use of multiple servlet engines to provide better performance (see e.g. Lai, [0588]), as noted by the Examiner on page 3 of the Office Action. However, Lai clearly states that this is to optimize "existing computing capacity" (see Lai, [0588] line 1), and not to optimize a web service description for a mobile device as recited in Applicants' independent claims. It follows that Lai also fails to disclose the creation of an accelerator output file that comprises an optimized web service description adapted for processing by said mobile device as recited in Applicants' independent claims. Accordingly, the burden of proof that is required to reject claims 1, 24 and 50 as being anticipated by Lai has not been met.

The inventors recognized that by creating a version of a web service description that is optimized for processing by a mobile device, savings (e.g. bandwidth, processing time, resources) might be had as the optimized web service description will be more compact in size, and can be more efficiently transmitted to and processed by the mobile device (see e.g. paragraph [0009] of Applicant's description).

Independent claims 1, 24 and 50, as amended, further requires that the act of optimizing comprises resolving symbolic references in said web service description such that said at least one accelerator output file is parseable by said

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mobile device in one pass. This feature is not disclosed in Lai. Lai makes reference to a JAXM/TSIK "Message Provider", and the concept of "single sign-on" by a web service requester using a mobile device, as noted by the Examiner on page 5 of the Office Action. The Examiner alleges that Lai discloses optimizing and resolving symbolic references for single sign-on, and that accordingly, the above-noted feature of Applicants' independent claims is disclosed in Lai. The Applicants respectfully disagree. First, the paragraph referenced by the Examiner at page 5 of the Office action states:

[1459] ProfileServlet – The ProfileServlet parses the SOAP request (stored in the file "request.xml") using the JAXM/TSIK Message Provider.

This paragraph does not disclose that the "Message Provider" of Lai is configured "for optimizing and resolving symbolic references for single sign-on by web service requested using mobile device". Respectfully, the Examiner, without basis, has read the quoted limitation into the paragraph. It is erroneous to conclude that this characterization of Lai's Message Provider is accurate even when taking the remainder of the Lai document into account. For example, in paragraph [0216] of Lai, it is stated that a Message Provider may be used to expose business services, and in paragraph [0522], it is stated that a Message Provider may deliver messages to message recipients. There is, however, no suggestion or teaching that the Message Provider is configured to process web service *descriptions*. Moreover, the Message Provider is not configured to resolve symbolic references in web service descriptions, as recited in Applicants' independent claims.

Furthermore, Lai also does not disclose creating at least one accelerator output file that is parseable in one pass. It is erroneous to conclude that this is equivalent to the "single sign-on" feature of the Lai system. As noted throughout

the Lai document (see e.g., paragraphs [1246], [1279], [1299], [1340], and [1360]), the "single sign-on" feature refers generally to the ability to allow:

...users to log in once to access multiple partner services. In other words, users enter login ID and password at the front page (for example, user ID "goodguy"), and then can access a number of partner Web sites with a list of URLs defined in a profile without hard-cording the URL into the program codes...

(see Lai, [1340]). Persons skilled in the art would not understand the teaching of "single sign-on" functionality to disclose the creation of at least one accelerator output file, comprising an optimized web service description, that is parseable in one pass as recited in Applicants' independent claims. Accordingly, the burden of proof that is required to reject claims 1, 24 and 50 as being anticipated by Lai has not been met.

Independent claims 1, 24 and 50, as amended, further requires that resolving symbolic references in said web service description comprises representing the plurality of web service description elements as nodes in a graph, re-ordering the nodes into a tree data structure so that said symbolic references are resolved in a forward direction, and creating said at least one accelerator output file from said tree data structure. This allows resultant created accelerator output files to be parseable by the mobile device in one pass (see e.g. paragraph [0058] of the Applicants' description). Lai neither teaches nor suggests a system where the foregoing acts are performed. Accordingly, the burden of proof that is required to reject claims 1, 24 and 50 as being anticipated by Lai has not been met.

It is respectfully submitted that Lai does not disclose a system or method for processing a web service description that comprises each and every limitation recited in any one of amended independent claims 1, 24 and 50, and that the

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Examiner's concerns have been addressed. It is further submitted that Lai also does not anticipate the subject matter of the dependent claims for at least the same reasons. Withdrawal of the rejections under 35 U.S.C. 102 is respectfully requested.

Applicants respectfully submit that each of claims 1-3, 6-26, and 29-50 is now in form for allowance, and a notice to that effect is respectfully requested.

Respectfully submitted,
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